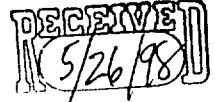




The Future in Natural Foods

1050 98 JUN -5 A9:22

May 19, 1998



59316

Mr. James T. Tanner, Ph.D.  
Acting Director  
Division of Programs and Enforcement Policy  
Office of Special Nutritionals  
Center for Food Safety and Applied Nutrition  
Food and Drug Administration  
Washington, D.C. 20204

Dear Dr. Tanner:

We are in receipt of your letter dated February 27, 1998 (copy enclosed). We intend to be in full compliance with FDA regulations and we are changing our label copy to accomplish this.

We are changing the name of this product to "RESPIR-ALL" and have included the following claim:

Respir-All™ is a synergistic combination of vitamins, minerals and herbal extracts for nutritionally supporting respiratory functions, especially from spring through fall."

This product will be sold under the brand name of NOW®.

I certify that the information contained in this notice is complete and accurate and that the notifying firm has substantiation that the statement is truthful and not misleading.

Sincerely,

Elwood Richard  
President

Enclosure

97S-0162

LET 1672

CODE 3282



**SUGGESTED USAGE:** As a dietary supplement take three tablets 1 to 2 times daily, preferably 20-30 minutes before meals. Persons with sensitive stomachs may take tablets with meals.

**now**

**Respir-All**

Potent Respiratory  
Support Formula

with Quercetin, Vitamin C,  
Nettle Extract and Bromelain

**60 Tablets**

# Supplement Facts

Serving Size 3 tablets Servings per Container 20

	Amount Per Serving	%Daily Value
Vitamin B-5 (Pantothenic Acid)	100 mg	1000
Vitamin B-6 (Pyridoxine HCL)	20 mg	1000
Vitamin C (as Magnesium Ascorbate)	500 mg	830
Magnesium (as Magnesium Ascorbate)	40 mg	10
Zinc (as L-OptiZinc™ monomethionine)**	10 mg	70
Quercetin	800 mg	†
Nettle Root Extract (Urtica dioica)		
(standardized 30 ppm scopolein)	500 mg	†
Bromelain (2000 GDU)	500 mg	†
Licorice Root (Glycyrrhiza glabra)		
(4:1 extract)	200 mg	†
Daily Value based on a 2,000 calorie diet		
†Daily Value not established		

Other Ingredients: Dicalcium phosphate, cellulose, silica, stearic acid, and magnesium stearate.

\*\***OPTI-ZINC** is a patented product of the InterHealth Corp.

Contains no sugar, salt, starch, yeast, soy, milk, corn, wheat, or egg.

Respir-All™ is a synergistic combination of vitamins, minerals and herbal extracts for nutritionally supporting respiratory functions, especially from spring through fall.

This statement has not been evaluated by the FDA. This product is not intended to diagnose, treat, cure or prevent any disease.

Distributed by  
NOW FOODS,  
BLOOMINGDALE, IL  
60108